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February 1, 2021

VIA ECF

Hon. Lois H. Goodman, U.S.M.J.
United States District Court, District of New Jersey
Clarkson S. Fisher Federal Building & U.S. Courthouse
402 East State Street, Room 7E
Trenton, NJ 08608

**Re: *In re Valeant Pharmaceuticals Int'l, Inc. Sec. Litig.*,
Case No. 3:15-cv-07658-MAS-LHG (D.N.J.)**

Dear Judge Goodman:

We write regarding objector Cathy Lochridge's January 29, 2021 motion for leave to file a reply in support of her motion for reconsideration. ECF No. 655. Among other reasons, that motion should be denied because it is untimely, as any reply was due January 25. *See* ECF No. 644; L. Civ. R. 7.1(d)(3). Thus, the untimely motion, and the accompanying reply brief filed without authorization on the docket (ECF Nos. 654 & 656), should be stricken.

Even aside from being late, the proposed reply serves only to rehash Lochridge's misleading arguments and mischaracterizations, including those regarding Plaintiffs' counsel. Because the proposed reply fails to provide anything new or any basis to reconsider this Court's denial of Mr. Clore's admission *pro hac vice*, Lead Counsel does not believe the motion should be granted. However, if it is not stricken or denied prior to the opposition date, Lead Counsel will file its opposition and stands ready to participate in any evidentiary hearing that the Court may order.

Respectfully submitted,



Christopher A. Seeger
Local Counsel for Lead Plaintiff

cc: Counsel of Record by ECF